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January 20, 2023

Via Electronic Case Filing

Hon. Andrew L. Carter, U.S.D.J. **United States District Court** Southern District of New York 40 Foley Square New York, New York 10007

> Re: Anorga v. Halseen, Inc., et al

> > Case No.: 1:22-cv-07799 (ALC)

Dear Judge Carter:

This firm represents Plaintiff in the above-referenced action. We write, jointly with Defendants, to respectfully request a 60-day stay of all deadlines and appearances in this case, including but not limited to Plaintiff's deadline to respond to Defendants' motion to compel arbitration.

For context, the parties are currently involved in three, separate lawsuits: the instant action, an employment discrimination action which is in arbitration, and a state court action filed by Defendant Halseen, Inc. against Plaintiff. In order to save time and resources, the parties have agreed to participate in private mediation (not through the SDNY panel). The parties are currently in the process of selecting a mediator and scheduling the mediation. As such, we ask that the Court stay this case for 60 days. If the case does not settle during the 60-day stay, we will submit a joint letter requesting new deadlines. If the parties require additional time to hold the mediation, we will promptly alert the Court. We thank the Court for its attention and consideration to this request.

Respectfully submitted,

Louis M. Leon, Esq. (LL 2057)

Attorneys for Plaintiff

All counsel (via ECF). cc:

> ON, ANDREW L. CARTER, JR. INITED STATES DISTRICT JUDGE

1/26/2023